

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

ESTATE OF YARON UNGAR et al  
Plaintiff(s)

v.  
PALESTINIAN AUTHORITY, et al  
Defendant(s)

C.A. No. 00-105)L

MOTION FOR ENTRY OF APPEARANCE  
PRO HAC VICE

Defendants Palestinian Authority, PLO and Palestinian officials hereby move that **Ramsey Clark** be admitted **PRO HAC VICE** in the above case as associate trial counsel with local associate counsel identified below, on the following grounds:

See attached  
statement



The case involves the following complex area of the law, in which  
\_\_\_\_\_ counsel specializes:

See attached  
statement



\_\_\_\_\_ counsel's long-standing representation of the  
client: \_\_\_\_\_



The local trial bar lacks experience in field of: \_\_\_\_\_



The case involves complex legal questions under the law of a foreign  
jurisdiction with which \_\_\_\_\_ counsel is familiar, specifically:



The case requires extensive discovery in a foreign jurisdiction  
convenient to \_\_\_\_\_ counsel, as follows: \_\_\_\_\_



It is a criminal case, and \_\_\_\_\_ counsel is defendant's counsel of  
choice.



Other: \_\_\_\_\_

Defendant:

By: *Ramsey Clark*  
Attorney for The Palestinian Authority, The PLO,  
Yasser Arafat, Muhammed Dahlan, Amin Al-Hindi,  
Razi Jabali, Jibril Rajoub, and Tawfik Tirawi

Dated: Sept. 14, 2000

*Ramsey Clark*  
Ramsey Clark

Lawrence W. Schilling

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ESTATE OF YARON UNGAR  
v. PALESTINE AUTHORITY  
00 CA 105(L)

**Statement in Support of Pro Hac Vice Application  
of Ramsey Clark and Lawrence W. Schilling**

This case involves the following complex area of the law and complex issues, among others, in which proposed associate trial counsel has special expertise and has previously represented the PLO.

Whether the Palestine Authority and the PLO are States under international law or whether they are entitled for various purposes to be treated as States and entitled to some or all of the privileges and immunities to which States are entitled; alternatively, their form of legal organization for purposes of litigation in the United States, including their capacity to be sued in U.S. courts; the amenability to service of process of all Palestinian defendants, including the individual officials named as defendants and the PLO and PA considered in the light of the status of Palestine as Observer at the United Nations and the rights and immunities that arise from this relationship with the United Nations; issues presented by the legislative or judicial assertion that U.S. courts can exercise jurisdiction over events occurring and claims arising far outside the United States and having little or no connection with the U.S.

See as examples of prior experience in this area of law relevant to these issues: Klinghoffer v. S.N.C. Achille Lauro, 937 F.2d 44 (2d Cir. 1991) and United States v. PLO, 695 F.Supp. 1456 (S.D.N.Y. 1988).

**ATTORNEY'S CERTIFICATION FOR PRO HAC VICE ADMISSION**

**RAMSEY CLARK**

(1) I certify that I am a member in good standing of the bar of the State(s) of **New York** and the following federal district, court bar(s) **SDNY**, without any restriction on my eligibility to practice, and that I understand my obligation to notify this Court immediately of any change respecting my status in this respect.

(2) I am currently admitted, and/or within the preceding 24 months have applied to be admitted, in the following cases in this district:

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(3) I have read, acknowledge, and agree to observe and to be bound by the local rules and orders of this Court, including the Rules of Professional Conduct of the Rhode Island Supreme Court, as adopted by this Court as the standard of conduct for all attorneys appearing before it.

(4) For purposes of this case I have associated with local associate counsel identified below, and have read, acknowledge, and will observe the requirements of this Court respecting the participation of local associate counsel, as set out in Local Rule 5, recognizing that failure to do so may result in my being disqualified, either upon the Court's motion or motion of other parties in the case.

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I certify that I have read and join in the foregoing motion, and acknowledge and agree to observe the requirements of Local Rule 5 in its entirety and as it related to the participation and responsibilities of local associate counsel.

Ramsey Clark  
Name  
Ramsey Clark

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Firm Name  
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212-979-1583  
Fax #

Deming E. Sherman  
Local Associate Counsel  
Deming E. Sherman  
1138  
R.I. Bar ID#

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2800 BankBoston Plaza  
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Fax #

**ORDER:**

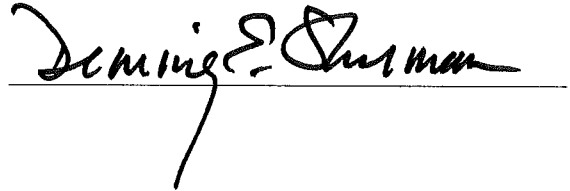
This motion is hereby \_\_\_\_\_.

\_\_\_\_\_  
U.S. District Judge

Date: \_\_\_\_\_

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of September, 2000, I mailed a copy of the within Motion for Entry of Appearance Pro Hac Vice by first class mail, postage prepaid, to David J. Strachman, Esq., Skolnik, McIntyre & Tate, Ltd., Suite 400, 321 South Main Street, Providence, RI 02903 and Nitsana Darshan-Leitner, 13 Leonardo da-Vinci Street, Tel Aviv, Israel.

A handwritten signature in black ink, appearing to read "David J. Strachman", is written over a horizontal line. The signature is stylized with a large, sweeping initial 'D' and a long, trailing flourish.